

ORIGINAL

Approved: Robert Allen  
 ROBERT ALLEN  
 Assistant United States Attorney

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Before: THE HONORABLE HENRY B. PITMAN  
 United States Magistrate Judge  
 Southern District of New York



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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of  
 18 U.S.C. §§ 1349, 1344,  
 513, 500, 1708, and 2

CHRISTOPHER WILLIAMS,

Defendant.

: COUNTY OF OFFENSE:  
 BRONX

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SOUTHERN DISTRICT OF NEW YORK, ss.:

MICHAEL C. MEMOLI, being duly sworn, deposes and says that he is a Postal Inspector with the United States Postal Inspection Service ("USPIS"), and charges as follows:

COUNT ONE  
 (Bank Fraud)

1. From at least in or about 2013 up to and including in or about at least November 2014, in the Southern District of New York and elsewhere, CHRISTOPHER WILLIAMS, the defendant, did willfully and knowingly execute a scheme and artifice to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, WILLIAMS deposited money orders containing material alterations into bank accounts at financial institutions, and aided and abetted the same.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT TWO  
 (Forged Securities)

2. From at least in or about 2013 up to and including in or about at least November 2014, in the Southern

District of New York and elsewhere, CHRISTOPHER WILLIAMS, the defendant, knowingly and with intent to deceive another person, organization, and government, did make, utter and possess counterfeited securities of a State and a political subdivision thereof and of an organization, and did make, utter, and possess forged securities of a State and a political subdivision thereof and of an organization, with intent to deceive another person, organization, and government, to wit, WILLIAMS cashed altered checks and money orders and aided and abetted the same.

(Title 18, United States Code, Sections 513 and 2.)

COUNT THREE  
(Forged Money Orders)

3. From at least in or about 2013 up to and including in or about at least November 2014, in the Southern District of New York and elsewhere, CHRISTOPHER WILLIAMS, the defendant, knowingly and with intent to defraud the United States, the Postal Service, and another person, did transmit, present, and cause to be transmitted and presented, money orders and postal notes, knowing the same to contain material alterations therein unlawfully made, with the intent to defraud the United States, the Postal Service, and another person, to wit, WILLIAMS cashed altered checks and money orders and aided and abetted the same.

(Title 18, United States Code, Sections 500 and 2.)

COUNT FOUR  
(Theft and Receipt of Stolen Mail Matter)

4. From at least in or about 2013 up to and including in or about at least November 2014, in the Southern District of New York and elsewhere, CHRISTOPHER WILLIAMS, the defendant, did knowingly steal, take, and abstract, and by fraud and deception did obtain, and attempt to so obtain, from and out of mails, post offices, and stations thereof, letter boxes, mail receptacles, and mail routes and other authorized depositories for mail matter, and from letters and mail carriers, letters, postal cards, packages, bags, and mails, and did abstract and remove from such letters, packages, bags, and mails, articles and things contained therein, and did secrete, embezzle, and destroy such letters, postal cards, packages, bags, and mails, and articles and things contained therein, and did steal, take, and abstract, and by fraud and deception did obtain, letters, postal cards, packages, bags, and mails, and articles and things

contained therein which had been left for collection upon and adjacent to collection boxes and other authorized depositories of mail matter, and did buy, receive, and conceal, and unlawfully have in their possession, letters, postal cards, packages, bags, and mails, and articles and things contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, the WILLIAMS stole and received, and aided abetted the theft of, checks and money orders out of parcels and packages of mail that were taken out of United States mail boxes and receptacles.

(Title 18, United States Code, Section 1708 and 2.)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I am a United States Postal Inspector and I have been personally involved in the investigation of this matter. I base this affidavit on that personal experience, as well as on my conversations with other law enforcement agents, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### Theft and Misuse of Money Orders

6. Checks and money orders are negotiable instruments that individuals and companies commonly use to send money through the mail. Based on my training and experience, I have become aware of schemes in which individuals attempt to convert for their own use checks and money orders sent by others. One such scheme proceeds as follows:

a. Members of the scheme use various devices or means to reach inside of mail boxes and remove mail, which they then search for checks and money orders.

b. Members of the scheme remove certain information from the checks or money orders, such as the intended payee and the amount of money. This information can be removed through a variety of means including washing, soaking, and bleaching the checks or money orders.

c. Members of the scheme substitute different information in the checks and money orders in the place of the information they removed, such as different payees and amounts of money. The altered checks or money orders are then deposited into bank accounts controlled by members of the scheme, cashed at check-cashing establishments or banks, or otherwise used to make payments benefiting members of the scheme.

Theft of Money Orders by Defendant

7. I believe that CHRISTOPHER WILLIAMS, the defendant, stole a money order with a particular serial number ("MO-1"), altered MO-1 such that he was listed as the payee, and then deposited MO-1 into an account he controlled. I believe this for the following reasons among others:

a. Based on records provided by Western Union, I have learned that an individual ("Victim-1") purchased MO-1 from Western Union on or about September 1, 2014.

b. Based on records provided by Bank of America, I have learned that MO-1 was deposited into a Bank of America account held in the name of "Christopher Williams" (the "Williams Account") on or about September 11, 2014. This transaction occurred at a Bank of America branch located in the vicinity of West 125th Street and 7th Avenue in New York, New York (the "West 125th Street Branch").

c. I have learned, by reviewing a copy of MO-1 in the form in which it was deposited into the Williams Account, that, when the deposit occurred, MO-1's listed payee was "Christopher Williams." I have also learned that "car payment" was written on MO-1 when MO-1 was deposited.

d. I have reviewed security images taken by the West 125th Street Branch on or about September 11, 2014 at approximately the same time as MO-1 was deposited. Those images show an individual I believe to be CHRISTOPHER WILLIAMS, the defendant, depositing a money order. I believe the individual to be WILLIAMS based in part on a comparison of the security images and a driver's license image provided by the New York Department of Motor Vehicles for "Christopher Williams."

e. I interviewed Victim-1 in or about May 2015. Based on my conversations with Victim-1, I have learned that



"Christopher Williams" was not the original or intended payee of MO-1, and that MO-1 was not meant to be used for a car payment.

8. I believe that CHRISTOPHER WILLIAMS, the defendant, stole a money order with a particular serial number ("MO-2"), altered MO-2 such that he was listed as the payee, and then deposited MO-2 into an account he controlled. I believe this for the following reasons among others:

a. Based on records provided by Western Union, I have learned that an individual ("Victim-2") purchased a money order with a particular serial number ("MO-2") from Western Union on or about September 1, 2014.

b. Based on records provided by Bank of America, I have learned that MO-2 was deposited into the Williams Account on or about September 16, 2014. This transaction occurred at a Bank of America branch located in the vicinity of Delancey Street and Ludlow Street in New York, New York (the "Delancey Street Branch").

c. I have learned, by reviewing a copy of MO-2 in the form in which it was deposited into the Williams Account, that, when the deposit occurred, MO-2's listed payee was "Christopher Williams." I have also learned that "car payment" was written on MO-2 when MO-2 was deposited.

d. I have reviewed security images taken by the Delancey Street Branch on or about September 16, 2014, at approximately the same time as MO-2 was deposited. Those images show an individual I believe to be CHRISTOPHER WILLIAMS, the defendant, depositing a money order.

e. I interviewed Victim-2 in or about May 2015. Based on my conversations with Victim-2, I have learned that "Christopher Williams" was not the original or intended payee of MO-2, and that MO-2 was not meant to be used for a car payment.

9. I believe that CHRISTOPHER WILLIAMS, the defendant, has stolen and deposited additional money orders into the Williams Account. I believe this for the following reasons:

a. Based on records provided by Bank of America, I have learned that thirteen additional money orders (MO-3 through MO-15), among others, were deposited into the Williams Account between in or about August 2014 and November 2014.

b. Based on records provided by Western Union, I understand that MO-3 through MO-15 were reported stolen and/or failed to reach their intended payee.

10. I believe that CHRISTOPHER WILLIAMS, the defendant, has stolen and deposited additional money orders into a Capital One bank account controlled by a co-conspirator not named in this Complaint ("CC-1" and the "CC-1 Account"). I believe this for the following reasons:


a. Based on records provided by Capital One, I have learned that thirteen additional money orders (MO-16 through MO-28), among others, were deposited into the CC-1 Account between in or about April 2013 and June 2013.

b. Based on conversations I have had with a management company, I understand that MO-16 through MO-28 were initially intended to be used to make rent payments and were not, and were not intended to be, payable to, or cashed or deposited by, WILLIAMS or CC-1.


c. Based on an images taken by a Capital One ATM (the "Images"), I have learned that an individual appearing to be WILLIAMS made a withdrawal from the CC-1 Account in or about June and July 2013.

d. I visited an address associated with CC-1 in or about February 2012 and interviewed an individual who claimed to be a relative of CC-1. During that interview, CC-1's relative identified WILLIAMS as the individual depicted in one of the Images and stated, in substance and in part, that WILLIAMS was in a relationship with CC-1.

WHEREFORE the deponent respectfully requests that a warrant be issued for the arrest of CHRISTOPHER WILLIAMS, the defendant, and that he be imprisoned or bailed, as the case may be.

  
MICHAEL C. MEMOLI  
Postal Inspector  
United States Postal Inspection  
Service

Sworn to before me this  
1st day of June 2015

  
THE HONORABLE HENRY B. PITMAN  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK